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Pending admission *pro hac vice*
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(San Francisco)**

I, D. Scott Chang, declare:

1. I am an attorney licensed to practice in California and am admitted to practice in this district. I am an attorney of record for the Plaintiffs in this action. I have personal knowledge of the matters set forth herein, and if called to testify, could and would testify to them.

2. Defendants have not answered the original complaint, a case management conference has not been held, discovery has not been conducted and a trial date has not yet been set.

3. This motion is timely and it will cause no delay in this action.

4. This amendment is not the product of bad faith. By this motion, Plaintiffs seek only to amend their Complaint add a class of defendants and class representatives, to add The Spanos Corporation as an defendant, and to strike Plaintiffs' contentions as to violations of the Americans With Disabilities Act.

I swear that the foregoing is true and correct under penalty of perjury.

Executed on September 11, 2007 at Washington, D.C.

S/ D. Scott Chang

D. Scott Chang,